Case 24-22690-JAD Doc 46 Filed 02/20/25 Entered 02/20/25 12:31:48 Desc Main Document Page 1 of 1

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Benito Rojas, : Bankruptcy Case No. 24-22690-JAD

.

Debtor. : Chapter 13

Benito Rojas,

Document No.: 46

Movant,

Related to Document No.:

:

Related to Claim No.: 5

Citizens Bank, N.A. sbm to Citizens:

v.

Bank of PA,

:

Respondent.

DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant with the Notice of Mortgage Payment Change filed on February 14, 2025, after reasonable investigation and upon review of the proposed Chapter 13 Plan, it appears to Debtor that the that the payment is sufficient to fund the proposed Chapter 13 Plan even with the proposed change for March 7, 2025.

The new post-petition monthly payment payable to Respondent is \$325.66, effective March 7, 2025, per the notice dated February 14, 2025. The Debtor's proposed Plan payment provides for a monthly payment to Citizens Bank, N.A. sbm to Citizens Bank of PA of \$341.32. Therefore, Debtor's proposed Plan remains sufficient.

Respectfully Submitted,

Date: February 20, 2025 /s/Brian C. Thompson

Brian C. Thompson, Esquire

Attorney for Debtor PA I.D. # 91197

Thompson Law Group, P.C. 301 Smith Drive, Suite 6 Cranberry Township, PA 16066

(724) 799-8404 Telephone

(724) 799-8409 Facsimile

bthompson@thompsonattorney.com